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Attorneys for Defendant
PATREON, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BRAYDEN STARK, JUDD OOSTYEN,
ISAAC BELENKIY, VALERIE BURTON,
LAURA GOODFIELD, and DENOVIA
MACK, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

PATREON, INC.,

Defendant.

Case No. 3:22-CV-03131-JCS

**DECLARATION OF CELINE G. PURCELL IN
SUPPORT OF DEFENDANT PATREON, INC.'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF PLAINTIFFS' REPLY IN
SUPPORT OF THEIR MOTION TO
SUPPLEMENT THE SUMMARY JUDGMENT
RECORD**

I, Celine G. Purcell, declare as follows:

1. I am an attorney admitted to practice law in California and before this Court. I am an associate at The Norton Law Firm PC and counsel of record for Defendant Patreon, Inc. I submit this declaration in support of Defendant Patreon, Inc.'s Administrative Motion to Seal Portions of Plaintiffs' Reply In Support Of Their Motion To Supplement The Summary Judgment Record. Except where otherwise stated, the statements in this declaration are based on my own personal knowledge and, if called to do so, I could and would testify competently to them.

2. A party seeking to seal certain filings must demonstrate that "compelling reasons" exist for the requested sealing. *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006). Requests for sealing must be narrowly tailored, using redactions instead of wholesale sealing where possible. *See* L.R. L.R. 79-5(b).

3. Patreon has compelling reasons to seek the sealing of specific, redacted portions of Plaintiffs' Reply In Support Of Their Motion To Supplement The Summary Judgment Record. Specifically, Plaintiffs' Reply discusses third party software Ketch and references various information and arguments filed under seal in Patreon's Opposition to Plaintiffs' Motion to Supplement the Summary Judgment Record. The contract between Ketch and Patreon stated:

16.2. Except as otherwise set forth in an Order Form, neither party will make any public statement relating to this Agreement without the prior written approval of the other, except that [Ketch] may include Customer's name and logo in its marketing, promotional materials, and customer lists.

Patreon has not obtained Ketch's approval.

4. Accordingly, Patreon moves to seal portions of the following document:

Document	Description	Designating Party
Reply	Plaintiffs' Reply in Support of Motion to Supplement the Summary Judgment Record: Page 2, lines 27-28; Page 3, lines 6-7, 9, 11; Page 4, lines 2-4, 6, 15-16	Patreon, Inc.

/s/ Celine G. Purcell
Celine G. Purcell